

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PLANETE BLEUE TELEVISION, INC. and  
PLANETE BLEUE TELEVISION II, INC.,

Plaintiffs,

vs.

A&E TELEVISION NETWORKS, LLC and  
AON/ALBERT G. RUBEN INSURANCE  
SERVICES, INC.,

Defendants.

**Civil Action No. 1:16-cv-9317-PGG**

**DECLARATION OF RENITA SHARMA IN SUPPORT OF  
AON/ALBERT G. RUBEN INSURANCE SERVICES, INC.'S  
MOTION TO DISMISS THE COMPLAINT**

I, RENITA SHARMA, do hereby declare under penalty of perjury:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, and counsel for Defendant Aon/Albert G. Ruben Insurance Services, Inc. ("AGR"). I am in good standing with the New York State Bar and the United States District Court for the Southern District of New York. I respectfully submit this Declaration in Support of AGR's Motion to Dismiss the Complaint of plaintiffs Planete Bleue Television, Inc. and Planete Bleue Television II, Inc. (collectively, "PBTv") as against AGR. I am fully familiar with all matters set forth in this Declaration, based on my own personal knowledge and information and documents provided to me by my client.

2. Attached hereto as Exhibit 1 is a true and correct copy of Commercial Lines Policy No. CNA1025659-14 issued by Great Divide Insurance Company to defendant A&E Television Networks, LLC for the coverage period March 1, 2012 to March 1, 2015, which has been redacted to conceal confidential financial information.

3. Attached hereto as Exhibit 2 is a true and correct copy of Commercial Lines Policy No. CUA1025744-14 issued by Great Divide Insurance Company to defendant A&E Television Networks, LLC for the coverage period March 1, 2012 to March 1, 2015, which has been redacted to conceal confidential financial information.

4. Attached hereto as Exhibit 3 is a true and correct copy of Film & Entertainment Liability Policy No. MCN000158551201 issued by AXIS Insurance Company to defendant A&E Television Networks, LLC for the coverage period March 1, 2012 to April 1, 2013 (as extended by endorsement), which has been redacted to conceal confidential financial information.

5. Attached hereto as Exhibit 4 is a true and correct copy of Film & Entertainment Liability Policy No. MCN000193951301 issued by AXIS Insurance Company to defendant A&E Television Networks, LLC for the coverage period April 1, 2013 to April 1, 2014, which has been redacted to conceal confidential financial information.

6. Attached hereto as Exhibit 5 is a true and correct copy of the AETN Insurance Coverage Program for Production Companies agreement signed by plaintiff PBTB and dated January 11, 2013.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Certificates of Liability Insurance for Policy No. CNA1025659-14, Policy No. CUA1025744-14, and Policy No. MCN000158551201 issued to plaintiff PBTB and dated January 23, 2013, which have been redacted to conceal confidential financial information.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Certificate of Liability Insurance for Policy No. MCN000158551301 issued to plaintiff PBTB and dated April 16, 2013, which has been redacted to conceal confidential financial information.

9. Attached hereto as Exhibit 8 is a true and correct copy of the AETN Insurance Coverage Program for Production Companies agreement signed by plaintiff PBTv and dated October 21, 2013.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Certificates of Liability Insurance for Policy No. CNA1025659, Policy No. CUA1025744, and Policy No. MCN000158551301 issued to plaintiff PBTv and dated October 29, 2013, which has been redacted to conceal confidential financial information.

11. Attached hereto as Exhibit 10 is a true and correct copy of an email sent by James Pedrick to Roberto Luca and others on December 6, 2013, and a true and correct copy of the attachment to that email, the Certificates of Insurance for Policy No. CNA1025659, Policy No. CUA1025744, and Policy No. MCN000158551301 issued to plaintiff PBTv on December 6, 2013, which has been redacted to conceal confidential financial information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on September 14, 2017.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: 

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